

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Lynchburg Division

RUTH ANN WARNER, as Guardian of
JONATHAN JAMES BREWSTER WARNER

Plaintiff,

v.

Case No. 6:19CV00055

CENTRA HEALTH, INC., *et al.*,

Defendants.

RULE 26(f) REPORT

Counsel for the Plaintiff and the Defendants have conferred in accordance with Rule 26(f) of the Federal Rules of Civil Procedure. The parties submit the following Joint Rule 26(f) Discovery Plan.

1. Counsel discussed the nature and basis of their claims and defenses.
2. Counsel had previously discussed the possibilities for prompt settlement and resolution of the case.
3. Counsel agreed that discovery between the parties shall be delayed until after the pending 12(b)(6) motions are heard.
4. Counsel reviewed the Court's Scheduling Order (Docket No. 26) and are in agreement with all of its terms with the exception of the following proposed agreed modifications:
 - a. That the deadlines for expert disclosure set forth in Paragraph 18 be altered as follows: The Plaintiff shall disclose experts 90 days before the close of discovery.

Defendant shall disclose experts 45 days before the close of discovery. Counsel agreed to provide dates for and set the depositions of experts prior to disclosure.

5. Counsel were unable to identify any particular need to conduct discovery in phases.
6. Counsel were unable to identify any reason to modify the limitations of discovery provided for by the Federal Rules of Civil Procedure, other than those modifications contained within this plan.
7. All items required to be discussed by Rule 26(f) were discussed.

We ask for this:

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CERTIFICATE OF SERVICE

I hereby certify that this 15th day of January, 2020, I filed the foregoing via the Court's CM/ECF electronic filing system, which will send a notice of such filing to all counsel of record.

_____/s/ M. Bryan Slaughter_____